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Comments to:
Federal Communications Commission
Washington, D.C.

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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JUN 09 1993

Secretary
Federal Communications Commission
1919 M Street NW
Washington, D.C. 20554

RE:

93-99

RM-8202

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FCC-MAIL ROOM

Bick Broadcasting Co., is the licensee of station KKKX-Knob Noster MO. Station KKKX is currently operating on Channel 289C3 and currently has an application on file to upgrade to Channel 289C2 as outlined in MM Docket 92-156.

Presently, FM-105 (Petitioner) is seeking and; the Commission has proposed substitution of channel 288C2 for channel 288C3 at Moberly, MO. Petitioner also seeks modification of its current construction permit to specify operation on the higher class channel. The two operating and proposed facilities are separated by one channel.

Petitioner's current construction permit, which it seeks modification is the following location:

Latitude: 39-24-54

Longitude: 92-24-36

According to the Commissions rules, separation of two class C2 stations, one channel removed, requires 130 kilometers between transmitter locations. The KKKX location, which has an application on file for C2 status, and the present KZZT location for which a construction permit modification is being sought are separated by only 127 kilometers, three kilometers short of full spacing. (See enclosure)

BICK BROADCASTING OPPOSES ANY PROPOSAL WHICH WOULD NOT PROVIDE FULL SPACING TO STATION KKKX AS A CLASS C2 STATION.

Bick Broadcasting will oppose any application to construct and operate a station without providing full spacing or equivalent protection as provided by the Commissions rules, to station KKKX-Knob Noster, MO.

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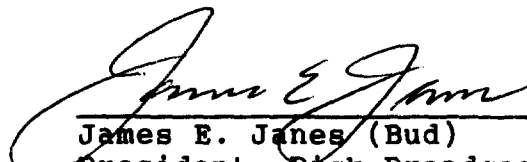
Bick Broadcasting Co. would not object to an alternative transmitter location for station KZZT which would provide full spacing to KXXK.

Bick Broadcasting Co. would not object to a directional antenna, with verifiable contour protection for station KXXK, being sought by KZZT.

Bick Broadcasting Co. would not object to a non-directional contour protection plan, which would also provide protection to station KXXK as if it were fully spaced to station KZZT.

Bick Broadcasting Co. seeks to protect the public interest which is served by station KXXK-Knob Noster, MO on channel 289C2.

These comments were provided by the undersigned, on behalf of Bick Broadcasting Co. licensee of station KXXK-Knob Noster, MO


James E. Janes (Bud)
President, Bick Broadcasting Co.

CERTIFICATION

Statements made in these comments are true and accurate according to my knowledge and belief.

Copies of these comments have been sent to:

John R. Wilner
Bryan Cave
700 Thirteenth Street NW Suite 700
Washington, D.C. 20005-3960


James E. Janes

BICK BROADCASTING
HANNIBAL, MO

Page 1
August 15, 1989

FM Spacing study

Title: KSAF
Channel 289C2 (105.7 MHz)
Database: DW 08/15/89

Latitude: 38-46-28
Longitude: 93-37-34
Safety zone: 65 km

Call	Auth	Licensee name	Chan	ERP-kW	Latitude	Br-to	Dist.
City of License	St	FCC File no.	Freq	EAH-m	Longitude	-from	(km)
KCMO-FM LIC	PACIFIC AND SOUTHERN COM	235C	100	39-04-14	292.0	89.26	
KANSAS CITY	MO BLH-871123KD	94.9	322	94-34-59	111.4	54.26	
Was KCPW 08/01/89; Affiliated with KCMO (AM)							
KLGS	CP TWIN LAKES COMMUNICATION	236A	3	38-24-32	118.1	85.55	
VERSAILLES	MO BPH-870909MM	95.1	100	92-45-42	298.7	71.55	
CP Granted 03/28/88; Call Granted 05/06/88							
KKJO	APP CARDINAL COMMUNICATIONS	286C	100	39-30-05	310.5	125.4	
SAINT JOSEPH	MO BPH-870225MG	105.1	492	94-44-11	129.8	20.41	
Amended 08/12/87; Was KSFT 03/08/89; Affiliated with KSFT (AM)							
KKJO	LIC CARDINAL COMMUNICATIONS	286C1	100	39-40-51	315.8	141.6	
SAINT JOSEPH	MO BLH-820823AL	105.1	177	94-46-47	135.0	62.59	
Was KSFT 03/08/89; Affiliated with KSFT (AM)							
KZNN	LIC KTTR-KZNN INCORPORATED	287C1	100	37-52-39	120.7	192.2	
ROLLA	MO BLH-861103KB	105.3	192	91-44-45	301.9	113.2	
Affiliated with KTTR (AM)							
KSAF	LIC BICK BROADCASTING COMPAN	288A	3	38-46-28	.0		
KNOB NOSTER	MO BLH-830705AF	105.5	91	93-37-34	.0	-105	
Was KLUK 05/18/87; Allocated to WARRENSBURG MO							
ALLOC	SPECIAL REFERENCE POINT	288A		38-48-30	292.2	10.00	
WARRENSBURG	MO	105.5		93-43-58	112.1	-95.0	
See KNOB NOSTER MO							
KESM-FM LIC	WILDWOOD COMMUNICATIONS	288A	3	37-51-51	198.7	106.6	
ELDORADO SPRINGS	MO BLH-850228LM	105.5	57	94-00-54	18.4	1.612	
Affiliated with KESM (AM)							
KZTZ	LIC FM 105 INCORPORATED	288A	3	39-24-54	55.5	127.0	
MOBERLY	MO BLH-870428KA	105.5	100	92-24-36	236.2	21.99	
ALLOC	GRANTED EFF 6/16/89	289A		39-47-12	10.4	114.3	
WHEELING	MO DOC-88-329	105.7		93-23-07	190.5	-48.7	
Filing window 06/19-07/19/89							
KSTZ	LIC TENORE BCG CO OF ST LOUI	289C	100	38-13-10	102.2	271.5	
SAINTE GENEVIEVE	MO BLH-871106KB	105.7	419	90-35-44	284.1	22.46	
Was KSGM-FM 10/10/87; Affiliated with KSGM (AM)							
KNCK	CP TATE COMMUNICATIONS INCO	289C	100	36-11-07	191.8	293.4	
SILOAM SPRINGS	AR BPH-870227IU	105.7	145BT	94-17-49	11.4	44.42	
CP Granted 09/19/88							